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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE ROGER T. BENITEZ)

UNITED STATES OF AMERICA,) U.S.D.C. No. 08CR1455-BEN
Plaintiff,) Date: September 2, 2008
v.) Time: 2:00 p.m.
ARSEN MOTIVOSYAN,) NOTICE OF MOTIONS AND MOTIONS TO:
Defendant.) (1) JOIN IN MOTIONS FILED ON BEHALF OF
CODEFENDANT ARA AVETYANTS.
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TO: KAREN P. HEWIT, UNITED STATES ATTORNEY, AND
REBECCA KANTER, ASSISTANT UNITED STATES ATTORNEY.

PLEASE TAKE NOTICE that on September 2, 2008, at 2:00 p.m. or as soon thereafter as counsel may be heard, Defendant Arsen Motivosyan, by and through his counsel, Jodi Thorp will ask this Court to enter an order allowing him to join in the motion to suppress evidence and statements due to an illegal stop.

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MOTIONS

Defendant Arsen Motivosyan, by and through his counsel, Jodi D. Thorp, Inc., moves this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law, and local rules for an order allowing him to join in codefendant Ara Avetyants motions to suppress evidence based on his challenging of the illegal stop in this case. Mr. Motivsoyan further requests this Court suppress any statements the government alleges Mr. Motivosyan made during the stop.

This motion is based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

Dated: August 19, 2008

s/ Jodi Thorp
JODI THORP
Counsel for Mr. Motivosyan